

Case IPR2025-00564
U.S. Patent No. 7,702,719

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CARVANA, LLC,
Petitioner

v.

INTERNATIONAL BUSINESS MACHINES CORPORATION,
Patent Owner

Case IPR2025-00564

U.S. Patent No. 7,702,719

Title: METHODS AND APPARATUS FOR REDUCING THE
NUMBER OF SERVER INTERACTIONS IN NETWORK-BASED
APPLICATIONS USING A DUAL-MVC APPROACH

Issue Date: April 20, 2010

MANDATORY NOTICES FOR PATENT OWNER
INTERNATIONAL BUSINESS MACHINES CORPORATION

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Patent Owner International Business Machines Corporation (“IBM”) hereby files its mandatory notices pursuant to 37 C.F.R. § 42.8. These notices are being timely filed within 21 days of service of the Petition, which occurred on January 31, 2025.

I. REAL PARTY-IN-INTEREST (37 C.F.R. § 42.8(b)(1))

The real party-in-interest for the Patent Owner is IBM.

II. RELATED MATTERS (37 C.F.R. § 42.8(b)(2))

A. Judicial Matters

The following litigation also involves U.S. Patent No. 7,702,719 and would affect, or be affected by, a decision in the proceeding:

Carvana, LLC v. International Business Machines Corp., Case No. 7:23-cv-08616
(KMK) (VR) (S.D.N.Y.)

III. DESIGNATION OF LEAD AND BACK-UP COUNSEL (37 C.F.R. § 42.8(b)(3))

Patent Owner hereby designates the following lead counsel and back-up counsel:

Lead Counsel	Back-up Counsel
Taeg Sang Cho (Reg. No. 69,618) tcho@desmaraisllp.com Desmarais LLP 230 Park Avenue New York, NY 10169 212-351-3400 (telephone) 212-351-3401 (facsimile)	Jordan N. Malz (Reg. No. 48,302) William N. Yau (to be admitted <i>pro hac vice</i>) Michael Hilyard (to be admitted <i>pro hac vice</i>) jmalz@desmaraisllp.com wyau@desmaraisllp.com mhilyard@desmaraisllp.com DESMARAIS LLP 230 Park Avenue New York, NY 10169 212-351-3400 (telephone) 212-351-3401 (facsimile)

IV. SERVICE INFORMATION (37 C.F.R. § 42.8(b)(4))

Please direct all correspondence regarding this proceeding to lead and back-up counsel at the addresses listed above. IBM also consents to electronic service at

tcho@desmaraisllp.com;

jmalz@desmaraisllp.com;

wyau@desmaraisllp.com;

mhilyard@desmaraisllp.com;

IBMCavanaService@desmaraisllp.com.

Case IPR2025-00564
U.S. Patent No. 7,702,719
Dated: February 21, 2025

Respectfully submitted,

/Taeg Sang Cho/
Taeg Sang Cho (Reg. No. 69,618)
tcho@desmaraisllp.com
Desmarais LLP
230 Park Avenue
New York, NY 10169
212-351-3400 (telephone)
212-351-3401 (facsimile)

*Counsel for Patent Owner,
International Business Machines Corporation*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on February 21, 2025 a complete copy of the foregoing was served on counsel of record for the Petitioner by filing this document through PTACTS and by sending this document via electronic mail to the following addresses:

Charley F. Brown (Reg. No. 52,658)
browncf@ballardspahr.com
Postal and Hand-Delivery Address:
Ballard Spahr LLP
999 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309

Brian W. LaCorte (*pro hac vice*
forthcoming)
lacorteb@ballardspahr.com
Postal and Hand-Delivery Address:
Ballard Spahr LLP
1 East Washington St., Suite 2300
Phoenix, AZ 85004-2555

Samhitha Medatia (Reg. No. 70,996)
medatias@ballardspahr.com
Postal and Hand-Delivery Address:
Ballard Spahr LLP
999 Peachtree Street, Suite 1000
Atlanta, GA 30309-3915

Drew Hensley (Reg. No. 79,305)
hensleyd@ballardspahr.com
Postal and Hand-Delivery Address:
Ballard Spahr LLP
1 East Washington Street, Suite 2300
Phoenix, AZ 85004

Dated: February 21, 2025

Respectfully submitted,

/Taeg Sang Cho/
Taeg Sang Cho (Reg. No. 69,618)
tcho@desmaraisllp.com
DESMARAIS LLP

*Counsel for Patent Owner,
International Business Machines Corporation*